

PRISONER'S CIVIL RIGHTS COMPLAINT (Rev. 05/2015)

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILEDIN THE UNITED STATES DISTRICT COURT
FOR THE _____ DISTRICT OF TEXAS
_____ DIVISION

2018 OCT 23 PM 4:20

DEPUTY CLERK AKG HUFMAN, ZAFAR #2127065

Plaintiff's Name and ID Number

Bill Clements Unit

Place of Confinement

318 - CV2829 - B
CASE NO. _____

(Clerk will assign the number)

v.

Jamal Qaddura 359-S-Riverfront Blvd
Defendant's Name and Address Dallas Texas 75207Jamal Qaddura et al 400-E. Weatherford St
Defendant's Name and Address FORT WORTH TEXAS 76102Official Administration DEPT. 622-W-Main St. 305.109
Defendant's Name and Address ARLINGTON TX 76010
(DO NOT USE "ET AL.")

INSTRUCTIONS - READ CAREFULLY

NOTICE:

Your complaint is subject to dismissal unless it conforms to these instructions and this form.

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, **DO NOT USE THE REVERSE SIDE OR BACK SIDE OF ANY PAGE.** ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

1. In order for your complaint to be filed, it must be accompanied by the statutory filing fee of \$350.00 plus an administrative fee of \$50.00 for a total fee of \$400.00.
2. If you do not have the necessary funds to pay the fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis*, setting forth information to establish your inability to prepay the fees and costs or give security therefor. You must also include a current six-month history of your inmate trust account. If you are an inmate in TDCJ-CID, you can acquire the application to proceed *in forma pauperis* and the certificate of inmate trust account, also known as *in forma pauperis* data sheet, from the law library at your prison unit.
3. The Prison Litigation Reform Act of 1995 (PLRA) provides "... if a prisoner brings a civil action or files an appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." See 28 U.S.C. § 1915. Thus, the court is required to assess and, when funds exist, collect, the entire filing fee or an initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the court will apply 28 U.S.C. § 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, then monthly installments from your inmate trust account, until the entire \$350.00 statutory filing fee has been paid. (The \$50.00 administrative fee does not apply to cases proceeding *in forma pauperis*.)
4. If you intend to seek *in forma pauperis* status, do not send your complaint without an application to proceed *in forma pauperis* and the certificate of inmate trust account. Complete all essential paperwork before submitting it to the court.

CHANGE OF ADDRESS

It is your responsibility to inform the court of any change of address and its effective date. Such notice should be marked "NOTICE TO THE COURT OF CHANGE OF ADDRESS" and shall not include any motion for any other relief. Failure to file a NOTICE TO THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedure.

I. PREVIOUS LAWSUITS:

- A. Have you filed *any* other lawsuit in state or federal court relating to your imprisonment? YES ☐ NO ☒
- B. If your answer to "A" is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)
 1. Approximate date of filing lawsuit: NONE
 2. Parties to previous lawsuit:
Plaintiff(s) NONE
Defendant(s) NONE
 3. Court: (If federal, name the district; if state, name the county.) NONE
 4. Cause number: NONE
 5. Name of judge to whom case was assigned: NONE
 6. Disposition: (Was the case dismissed, appealed, still pending?) NONE
 7. Approximate date of disposition: NONE

II.

PLACE OF PRESENT CONFINEMENT: Bell Clements Unit

III.

EXHAUSTION OF GRIEVANCE PROCEDURES:

Have you exhausted all steps of the institutional grievance procedure?

☒ YES ☐ NO

Attach a copy of your final step of the grievance procedure with the response supplied by the institution.

IV.

PARTIES TO THIS SUIT:

A. Name and address of plaintiff: JAMAL QADDURA et al359-S-RIVERFRONT Bld Dallas Texas 75207GHUFRAN, ZAFAR Bell Clements Unit 9601 Spur 59/ Amarillo TX 79107

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: JAMAL QADDURA et al359-S-RIVERFRONT Bld Dallas, Texas 75207

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Breached duties under contract Damage Cause HARM Violated RightsDefendant #2: JAMAL QADDURA et al400-E-Weatherford ST Fort Worth Texas 76102

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Breached duties under contract Damage Cause HARM Violated RightsDefendant #3: THE Administration DEPT OF Bond. 622-W-Main ST Arlington TX 76010BREACHED duties under contract- Damage Cause HARM Violated Rights

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

SEE: Attachment claim Constitutional Violation For ReliefDefendant #4: THE Administration Officials et al of The BondingCompany 359-S-RIVERFRONT Bld Dallas TX 75207

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Defendant #5:

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

V. STATEMENT OF CLAIM:

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

ON 4-15-2017 DAY OF IN the bail Bond Company of Jamal Baddura posted Bond of \$55,000 Dollars Cash Bond of a Murder Charge. THE CONTRACT State that AFTER DATE OF TRIAL. PLAINTIFF WOULD BE REIMBURSEMENT OF THE Payment (7) THE TRIAL COURT'S RECORDS and THE Dallas ARE FORT WORTH Bond Company. HAS (A) Valid Existence CONTRACT, CLAIMS under TEXAS LAW. The PERFORMANCE (OR) TENDERED BY the Plaintiff, Defendant BREACHED its duties under that contract caused Damage, Sustained, Suffered AS A RESULT OF INJURY, INTENTIONAL INFLICTION, emotional, Distress, BASED ON REFUSAL TO make Lumpsum Payment Negligent contract Fraud, ORDER INJUNCTIVE RELIEF See: ATTACHMENT Grounds Claim FOR Relief Constitutional Violations

VI. RELIEF:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

INJUNCTIVE RELIEF, RECOVER THE LUMP SUM Payments BACK OF 55,000. AND 100,000 Damage Pain's suffering emotion Distress HARM

VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases.

B. List all TDCJ-CID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? YES ☒ NO

B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): NONE

2. Case number: NONE

3. Approximate date sanctions were imposed: NONE

4. Have the sanctions been lifted or otherwise satisfied? YES ☐ NO ☐

D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued. (If more than one, use another piece of paper and answer the same questions.)

1. Court that issued warning (if federal, give the district and division): NO
2. Case number: N/A
3. Approximate date warning was issued: N/A

Executed on: 10-15-2018
DATE

(Signature of Plaintiff)

PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this 10th day of 10-15-, 20 18
(Day) (month) (year)

Ghuf GHUFRAN ZAPAR

Ghuf GHUFRAN ZAPAR
(Signature of Plaintiff)

WARNING: Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.

EXHIBIT (A)

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p><i>[Signature]</i></p>	
<p>1. Article Addressed to:</p> <p>JAMAL QADDURA AAA BONDING 359 S. RIVER FRONT BLVD Dallas TX 75207</p>		<p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery</p> <p><i>[Signature]</i></p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0360 0001 3992 1624</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery over \$500</p>		<p>Barcode: 9590 9403 0394 5163 7834 11</p>	

PS Form 3811, April 2015 PSN 7530-02-000-9053

Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD

UNITED STATES POSTAL SERVICE

4E36



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box •

GHUFRAN ZAFAR # 2127065
clerk unit
9601-SPUR 591
Amarillo, TX 79107

USPS TRACKING#



9590 9403 0304 5163 7074 10

1.

DATE 2018

UNITED STATES DISTRICT COURT

OFFICE OF THE CLERK

NORTHERN DISTRICT OF TEXAS

1100 COMMERCE - ROOM #1452

DALLAS TEXAS 75242-1495

#2127065

PLAINTIFF PROSE

GHAFAR, ZAFAR

§
§
§
§

NO. 20-17-0019-CR

N/D:

JAMAL QADHURA ETAL

AND THE ADMINISTRATION DEPARTMENT ETAL

DEFENDANT SUIT IS AGAINST INDIVIDUALLY

AND IN THEIR OFFICIAL CAPACITIES

SUMMONS

TO: THE ABOVE-NAMED AND REQUIRED
TO SERVE UPON PLAINTIFFS, WHOSE ADDRESS
HERE AN ANSWER TO THE COMPLAINT WHICH
IS HEREWITH SERVED UPON YOU, WITHIN 20 DAYS
AFTER SERVICE OF THIS SUMMONS UPON YOU,
EXCLUSIVE OF THE DAY OF SERVICE (OR 60 DAYS
IF THE U.S. GOVERNMENT OR OFFICER / AGENT
THEREOF IS (A) DEFENDANT, IF YOU FAIL TO DO SO
JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST
FOR THE RELIEF DEMANDED IN THE COMPLAINT

CLERK OF THE COURT,

DATE: _____

G.C.

1 DATE 10-15-2018
UNITED STATES DISTRICT COURT
OFFICE OF THE CLERK
NORTHERN DISTRICT OF TEXAS
1100 COMMERCE - ROOM 1452
DALLAS, TEXAS 75242-1495

TDCTD 2127065
PETITIONER PROSE
GHUFRAN ZAFAR
9601 SPUR 591
BILL CLEMENTS UNIT
AMARILLO, TEXAS 79107

NO: 20-17-00119-CR

NOTICE REQUEST

CLERK OFFICE

WOULD YOUR OFFICE DEPARTMENT
FILE 31983 CIVIL ACTION FOR A) BONDING
CAMPANY TO REIMBURSEMENT OF PAYMENT
TRULY YOUR KIND ASSISTANCE IN THIS
MATTER ARE SINCERELY APPRECIATED PLEASE
RETURN DATE OF ITS FILING IN 31983 CIVIL
ACTION SEE: ATTACHMENT DOCUMENT HEREIN

THANK YOU

GHUFRAN ZAFAR # 2127065

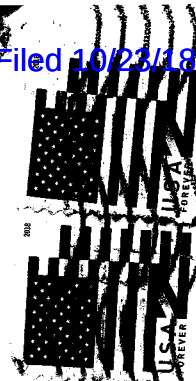
GHUFRAN ZAFAR PROSE

C.C.

GHLIFARN, ZAFAR 212 7065
Bill Clements unit
9601 SPUR 591
AMARILLO, TEXAS 79101

AMARILLO TX 791

18 OCT 2018 PM 1 L

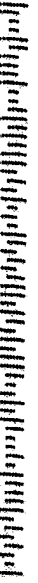


UNITED STATES District Court
OFFICE OF THE CLERK
NORTHERN DISTRICT OF TEXAS
1100 COMMERCE - ROOM #1452
DALLAS, TEXAS 75242-1495



LEGAL MAIL

7524231310



PRIVILEGED OFFENDER MAIL
NOT INSPECTED BY TEXAS
DEPARTMENT OF CRIMINAL
JUSTICE - CORRECTIONAL
INSTITUTIONS DIVISION

C980#?